

Robert R. Parker, Jr.
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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
EUGENE DIVISION**

PRESTON BERMAN,)	
)	Civil Action No.6:23-cv-01497-AA
Plaintiff,)	
)	PLAINTIFF'S MOTION for
vs.)	EXTENSION OF TIME TO RESPOND
)	DEFENDANT'S MOTION TO DISMISS:
CHRISTINE KOTEK, in her official)	FRCP 12b(6)
capacity as GOVERNOR of the STATE of)	
OREGON, ELLEN ROSENBLUM, in her)	
official capacity as ATTORNEY GENERAL)	
for the STATE of OREGON, DAVE)	
BADEN, in his official capacity as Interim)	
DIRECTOR for the OREGON HEALTH)	
AUTHORITY, ALISON BORT, in her)	
official capacity as EXECUTIVE)	
DIRECTOR, of the OREGON)	
PSYCHIATRIC SECURITY REVIEW)	
BOARD, DOLORES MATTEUCCI, in her)	
official capacity as SUPERINTENDENT of)	
OREGON STATE HOSPITAL, STEVE)	
GUNNELS, in his official capacity as the)	
DISTRICT ATTORNEY for DESCHUTES)	
COUNTY, OREGON,)	
)	
Defendants.)	
	/	

COMES NOW Plaintiff, Preston Berman, by and through his undersigned counsel and moves this Court for a ten (10) day extension to interpose his response in opposition to the Motion to Dismiss filed by Defendants.

This Motion is premised on the Declaration of Counsel, the files and records of this Court, good faith and is not interposed for purposes of delay.

Dated this 31st day of January 2024

Respectfully submitted,
LAW OFFICE OF ROBERT R. PARKER, JR., LL. B., LLC

By: /s/ Robert R. Parker, Jr.
Robert R. Parker, Jr.
Attorney for Plaintiff
OSB 216437

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LOCAL RULE 7-1 CONFERRAL

Pursuant to LR 7-1, Counsel for Plaintiff and Defendants engaged in a conferral relative to the motion and it was agreed that the Motion for Extension of Time would be unopposed by Counsel for the Defendants.

Dated this 31st Day of January 2024

Respectfully submitted,

/s/ Robert R. Parker, Jr.
Robert R. Parker, Jr.

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**UNITED STATES DISTRICT COURT
 FOR THE DISTRICT OF OREGON
 EUGENE DIVISION**

PRESTON BERMAN,)	
)	Civil Action No.6:23-cv-01497-AA
Plaintiff,)	
)	DECLARATION OF COUNSEL IN
vs.)	SUPPORT OF THE MOTION TO
)	EXTEND TIME TO RESPOND TO:
)	MOTION TO DISMISS:
CHRISTINE KOTEK, in her official)	
capacity as GOVERNOR of the STATE of)	
OREGON, ELLEN ROSENBLUM, in her)	
official capacity as ATTORNEY GENERAL)	
for the STATE of OREGON, DAVE)	
BADEN, in his official capacity as Interim)	
DIRECTOR for the OREGON HEALTH)	
AUTHORITY, ALISON BORT, in her)	
official capacity as EXECUTIVE)	
DIRECTOR, of the OREGON)	
PSYCHIATRIC SECURITY REVIEW)	
BOARD, DOLORES MATTEUCCI, in her)	
official capacity as SUPERINTENDENT of)	
OREGON STATE HOSPITAL, STEVE)	
GUNNELS, in his official capacity as the)	
DISTRICT ATTORNEY for DESCHUTES)	
COUNTY, OREGON,)	
)	
Defendants.)	
	/	

1 Dated this 31st day of January 2024

2 Respectfully submitted,
3 **LAW OFFICE OF ROBERT R. PARKER, JR., LL. B., LLC**

4 By: /s/ Robert R. Parker, Jr.
5 Robert R. Parker, Jr.
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CERTIFICATE OF SERVICE

I, Robert R. Parker, Jr., and hereby certifies that I served a copy of the foregoing Motion for Extension of Time upon the following person(s) so entitled to same, to wit:

Craig M. Johnson, Esq
Michelle Enfield, Esq.
Oregon Department of Justice
1162 Court Street, NE
Salem, Oregon 97301-4096
Craig.m.johnson@doj.state.or.us
Michelle.enfield@doj.state.or.us

By serving a true copy thereof upon the parties above referenced by electronic email at the email addresses set forth herein above on this the 31st day of January, 2024.

Respectfully submitted,

/s/ Robert R.Parker,Jr
Robert R. Parker, Jr.